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August 19, 2016

VIA ECF

Hon. Magistrate Judge Arlene Rosario Lindsay
United States District Court
100 Federal Plaza
Central Islip, New York 11722

Re: Carroll v. Krumpter, et al.
15-CV-01550 (ADS) (ARL)

Dear Magistrate Judge Lindsay:

This office represents defendants, Thomas C. Krumpter, Steven E. Skrynecki, the Nassau County Police Department, Daniel P. Flanagan, Police Officer Nikolas Budlimic and County of Nassau in the above referenced matter. I write this letter to inform the Court of recent developments which compel defendants to respectfully request additional time to respond to plaintiff's discovery demands, and also to extend the discovery deadline of September 16, 2016 [DE 13-1]. I submit this request with the consent of Robert T. Bean, counsel for plaintiff Andrew Carroll.

This case was originally assigned to Deputy County Attorney Diane Petillo. Unfortunately, Ms. Petillo was injured two weeks ago while participating in an office softball game, and tore a hamstring in one of her legs, which will most likely require surgery. She has not been able to work since that time, and is in fact on medical leave. I have now been assigned to take over the defense of this action in her stead. In reviewing the file, I note that there are outstanding discovery demands which defendants owe plaintiff's counsel. Pursuant to the Court's August 1, 2016 Order [DE 18], defendants are obligated to serve their initial disclosures, and respond to plaintiff's Request for Production of Documents, by today, August 19, 2016.

I have conferred with Mr. Bean about the above circumstances, and he has agreed, subject to the Court's approval, to extend the discovery deadline from September 16, 2016 to November 18, 2016. Of course, I will immediately attend to providing responses to outstanding discovery demands well before that time, and schedule depositions with Mr. Bean once written discovery is provided.

For the foregoing reasons, defendants respectfully request, with the consent of plaintiff's counsel, that the discovery deadline be extended from September 16, 2016 to November 18, 2016, and that defendants be afforded the opportunity to provide written discovery responses by September 30, 2016.

Defendants thank Your Honor for your attention and consideration in this matter.

Respectfully submitted,

/s/ Ralph J. Reissman
RALPH J. REISSMAN
Deputy County Attorney

cc: Robert. T. Bean, Esq.
Attorney for Plaintiff